

Ruslinco Pty Ltd

ACN: 062 240 279

Phone: (07) 49553819

Fax: (07) 49553649

Mob: 0408 062859

Email: rrusling@bigpond.com

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Committee Secretary

House of Representatives Standing Committee on Communications, Transport and the Arts

Parliament House

CANBERRA ACT 2600.

Dear Ms Crooks

Inquiry into managing fatigue in transport

The Great Barrier Reef is a natural treasure that Australia has done much to protect, but unfortunately the potential for fatigue within the marine pilotage industry is a danger that has the capacity to endanger the reef.

Not only is the number of hours worked and how they are worked a contributor to fatigue, but also the underlying state of health and mental wellbeing of the person involved has a great effect on the level of fatigue experienced.

Causes of and contributing factors to fatigue.

Since the changes in regulatory arrangements for marine pilotage in the Great Barrier Reef, and the creation of two separate pilotage companies from the one original company in 1993, there has been an aggressive price war between the two main providers of pilots to the shipping industry. Recently a third smaller localised provider also commenced operations, leading to further deteriorations within that particular local area.

For contractual reasons pilots do not have easy portability between providers, and are thus locked in to the respective retailer of their services. Because of market forces and the relative success of one of the providers, there has developed a substantial imbalance between the workloads of the pilots contracted to the different providers.

Consequently one group are piloting up to 50% more vessels per pilot per year than the second group. Interestingly the second group are piloting approximately the number of vessels per year which has historically been considered the maximum that could be done with due regard to safety in respect of fatigue. This second group are yet still suffering from fatigue and stress. The change in pilots circumstances must bear most of the blame

The changes in regulatory arrangements of the industry and consequent aggressive competition has lead to a crash in the level of fees earned by pilots. This has caused not only a substantial reduction of earnings for all pilots, as well as money spent on infrastructure, but also fatigue leading to stress in both groups of pilots. One group is working excessive hours causing fatigue

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14 Upton Avenue Mackay, Queensland 4740

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leading to stress, while the second group is often idle and uncertain leading to stress and thus fatigue.

Consequences of fatigue in sea transport (Great Barrier Reef).

The consequences of fatigue effecting a marine pilot within the Great Barrier Reef are all too easy to see. With the onset of fatigue a pilot could loose situational awareness and as a worse case could actually fall asleep while piloting a ship adjacent to reefs or cays within the Great Barrier Reef. The ensuing possibility of pollution and damage to not only the reef, but the shipping and tourist industries are all too evident.

Pilotage in the Great Barrier Reef is in place basically for one reason only, and that is to protect the reef from the consequences of a shipping accident. The Great Barrier Reef has been inscribed on the World Heritage List as well as being a world recognised shipping route. With a well functioning pilot service there is no reason it cannot continue to contribute to Australia's gross national product by providing a vital short cut to Asia for the shipping industry.

Additionally because of the deteriorating working conditions for pilots, both groups are now finding it increasingly difficult to attract suitably experienced candidates to the profession. This is leading to a steadily aging pilot population and thus fatigue and stress among the pilots who remain in the service. Not only are the older pilots fatigued, but also the younger pilots are forced to carry a larger workload.

Pilots operating within the Great Barrier Reef are by necessity all ex ship captains, this has historically been a prerequisite to commencing training to become a pilot. The demands of assisting with the safe navigation of vessels for extended periods while operating with only normal sized bridge teams as opposed to "full stand-by" sized teams in restricted waters meant that command time was essential.

Recruiting for the future of the pilotage industry is adversely effected by the fatigue of the serving pilots. Ship captains see the state of health of current pilots suffering from the prevailing situation of fatigue and stress. When added to falling incomes, ship captains are unsurprisingly not attracted to the pilot service as a career. The consequence of this is the eventual devastation of the pilot industry in the medium to long term.

Serving ship captains do not see the pilot service as an attractive alternative to staying "at sea". A profession which was once a much sought after natural extension of a successful ship captains career, is now something that is avoided and not considered attractive enough to pursue, even though the Australian shipping industry is in decline.

As Professor Hilmer stated, there are most assuredly some natural monopolies, the police service and fire fighting are obvious examples. Industries where providing the specific service and thus supporting safety are paramount. The pilotage industry is also a natural monopoly. It is there to "police" the standards of navigation within the Great Barrier Reef and to ensure the safest possible maritime environment for the benefit of all Australians. Even the Americans, the greatest of all capitalists, after bitter experience have re-regulated their pilotage industry to remove competition to ensure that pilots can do the job intended, and not be overwhelmed by stress and fatigue.

At the end of the day, what is more important, that a shipowner gets a pilotage done for a few dollars less, or that the Great Barrier Reef is effectively protected? this is the choice that will soon have to be made. Ask Exxon if they now think it was a good idea to omit the carriage of a pilot on the Exxon Valdez to save a few dollars.

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Fatigue in pilots stemming from the very state of the industry is directly effecting the delivery of this vital service to the shipping industry.

Initiatives in transport addressing the causes and effects of fatigue.

The recent initiative of the Australian Maritime Safety Authority to regulate the rest breaks that must be taken by pilots is a commendable and sensible initiative.

However, more importantly pilots contracted to both pilotage providers are in the process of forming a peak body (Sea Pilots Queensland). One of SPQ's objectives is to facilitate a more efficient use of the total pilotage population available to the industry, and thus attack the causes of fatigue within the industry.

The peak body would foresee the eventual formation of a pool of all pilots available to the industry. All pilotage retailers could then drawn pilots from this common pool, thus evening out the imbalance in workloads and thus also alleviating some problems plaguing retailers.

SPQ would also drawn on the experience of other kindred pilotage organisations, both Australian and overseas to use strategies that have been trialed both locally and overseas to minimise fatigue, the effects of fatigue could then be minimised by the use of these plans.

However this is only part of the recruiting problem facing the industry. Without an increase in remuneration serving captains will still not be attracted to the pilotage industry. Thus endangering the long term future of this vital industry.

Ways of achieving greater responsibility by individuals, companies, and governments to reduce the problems related to fatigue in transport.

Companies:

Pilots in the Great Barrier Reef hold licenses from the commonwealth government which are issued through the Australian Maritime Safety Authority. With the issuing of a license comes responsibilities, guidelines and laws which must be followed. It is incumbent on both the pilot and the government via AMSA to observe the necessary restrictions and limitations on their behaviour. This is a natural and sensible circumstance in protecting the IMO designated worlds first and so far only "Particular Sensitive Sea Area".

It is therefore only natural that companies providing pilots to the shipping industry should also be licensed so that they would also have to subscribe to laws and guidelines, and have some greater responsibility other than simply their company profits. They should be made to look more closely at their part in combating fatigue in the pilots servicing this most precious natural asset. The reef is too valuable to have such an overt influence with no restrictions placed upon it, effecting the business of piloting ships within this World Heritage Listed area.

For example as a minimum, provider companies should be required to use only the International Maritime Pilots Association standards when supplying pilot boats or helicopters used to transfer pilots to vessels. As some transfers can take in excess of two hours the comfort and seaworthiness of the pilot boat can impinge directly on the level of fatigue of the pilot before they even commence duties. Likewise the use of a small single-engine helicopter to fly 120 miles out to sea to land a pilot on a vessel at night is not the best way to ensure the pilot commences duties fatigue and stress free.

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Government:

A seemingly easy answer for government (AMSA) to combat fatigue in pilots would be to increase the length of the rest period that must be taken by pilots between vessels. The effectiveness of this strategy has also yet to be proved. However as pilots are self employed this would lead to a further reduction in incomes, which would make the profession even less attractive to new recruits than it is now. The withering and final destruction of this vital service to the maritime community would surely follow.

A better solution is for government to fund and run (or at least facilitate) the short courses that pilots will be required to attend under the auspices of the peak body being created (Sea Pilots Queensland). Fatigue orientated workshops can be of use to the pilots, to show them ways of delaying the onset of fatigue, instead of trying to combating it after it has already begun.

Summary

- ✓ Aggressive competition following deregulation has decimated an essential service industry and endangered the immensely valuable Great Barrier Reef by the emergence of fatigue and stress among pilots.
- ✓ Fatigue among Barrier Reef pilots has the potential to contribute to accidents with the reef.
- ✓ The pending creation of a peak pilots body (Sea Pilots Queensland) is an attempt by the pilots themselves to remedy some of the ills of the industry and thus eliminate fatigue.
- ✓ Pilotage provider companies should be licensed and thus regulated to cause them to assist with the improvement of the industry and thus help to eliminate fatigue among pilots.
- ✓ Government should give all assistance in the creation and fostering of Sea Pilots Queensland.
- ✓ Government should work closely with Sea Pilots Queensland to facilitate the running of workshops and other means to eliminate fatigue among pilots.
- ✓ Government should work closely with Sea Pilots Queensland to improve the basic state of health of the industry, thus eliminating fatigue and stress and ensuring the future life of the industry through effective recruiting.
- ✓ Marine pilotage is a natural monopoly and should be treated as such, thereby ensuring the elimination of fatigue among pilots and effective protection for the Great Barrier Reef.

Captain Roger Rusling.
Licensed Pilot.

Hard copy to follow by post.

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